

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK

HO MYUNG MOOLSAN CO., LTD. and
HYUN- SONG KANG,

Plaintiffs,

-against-

MANITOU MINERAL WATER, INC., RAPHAEL
DRUG AND HEALTH CO., O-YOON KWON, NAM-IN
JHON, HANMI HOME SHOPPING COMPANY, NEW
JERSEY FLEA MARKET NEWS, NEW YORK FLEA
MARKET NEWS a/k/a WWW.FINDALLUSA.COM.
JOHN DOES 1 THROUGH 10 AND JANE DOES 1
THROUGH 10 AND ABC COMPANIES 1 THROUGH
100,

Defendants.

Case No. 07 CIV 7483

AFFIDAVIT

STATE OF NEW YORK)
)ss:
COUNTY OF NEW YORK)

MYUNG SUK LEE, being duly sworn, deposes and says:

1. I am the principal of a local newspaper known as the "Korean American Times" of which 70% of its contents consist of advertising.
2. I am aware of this lawsuit and the fact that the plaintiff has named as defendants the following entities: Hanmi Home Shopping Company, New Jersey Flea Market News and New York Flea Market News a/k/a www.findallusa.com.
3. So there is no misunderstanding, the Korean American Times is distributed in both New York and in New Jersey and they have the same contents. There is no such thing as the "New Jersey Flea Market News" and "New York Flea Market News".
4. In addition, "www.findallusa.com" is the Korean American Times' website

for classified ads, such as help wanted. We do not sell water or similar products on our website.

5. I have known the defendant, O-Yoon Kwon, for approximately five years. We first met in connection with the Korean American Chamber of Commerce of New York of which I am the current president and Dr. Kwon was the former president. Our organization consists of approximately 300 members.

6. After we met, our organization invited Dr. Kwon to participate in some seminars and exhibitions which the organization was sponsoring in Queens. The exhibition included other Korean businesses which sought to promote their products.

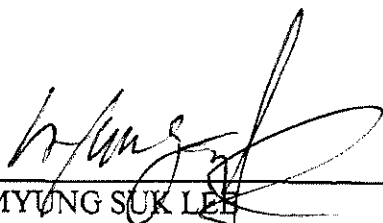
7. Dr. Kwon had previously forwarded to me five boxes of Manitou mineral water (60 bottles). We did not pay for this water and none of this water was sold by your deponent or my business. As a courtesy to Dr. Kwon, we advertised (without charge) the sale of his water in my newspaper.

8. Dr. Kwon informed me that two of our ads contained the incorrect image of the Manitou water bottle. We subsequently corrected this and placed the correct image in our newspapers, as reflected in our newspaper dated July 27, 2007 (Exhibit "N" hereto).

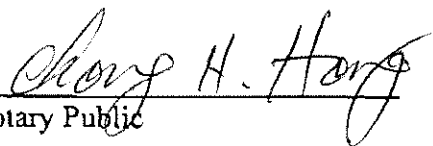
9. At the bottom of all of our advertisements for Manitou water are references to "Hanmi Home Shopping Company". I created this name in order to assist marketing Manitou's water. We used this name for all products that we consider to be of high quality. Whenever we received telephone calls inquiring as to the water, we referred the caller to Dr. Kwon and we gave free samples of the water to callers that came to our office. None of this occurred that frequently.

10. There are no agreements between your deponent, Korean American Times and Dr. Kwon or any of his companies with respect to the sale of Manitou water and we have no

expectation of ever receiving any money in connection with said water.


MYUNG SUK LEE

Sworn to before me this
27th day of September 2007.

* 
Notary Public

CHONG H. HONG
NOTARY PUBLIC, State of New York
No:01HO4664597
Qualified in Queens County
Commission Expires March 30, 2010